

## REMARKS

### I. Introduction

In response to the Office Action dated July 12, 2001, claims 1, 22, 24-27, 34-36, 39, 42-43, 45-47, and 49-54 have been amended, and claims 64-105 have been added. Claims 1-105 remain in the application. Amendments to the specification and formal drawings are also submitted herein. Such amendments merely clarify typographical errors found in the specification. Re-examination and re-consideration of the application, as amended, is requested.

### II. Prior Art Rejections under 35 U.S.C. §102(b)

In paragraphs (1)-(2) of the Office Action, claims 1, 6-22, 26-43, and 46-63 were rejected under 35 U.S.C. §102(b) as being anticipated by Kiernan et al., U.S. Patent No. 5,701,137 (Kiernan).

Specifically, claim 1 was rejected as follows:

As per claim 1, Kiernan discloses a system for displaying a tree structure for representing hierarchical data in programmed computer comprising:

Selecting one or more objects on the original tree to be contained in the customized tree in response to user input; linking the selected object in a user-specified manner (fig. 8b, col. 3, lines 1-8, col. 6, lines 26-61).

Applicants traverse this rejection. Kiernan fails to teach, disclose, or suggest the selection of objects located in disparate places across different branches of an original tree. The independent claims have been amended to add that the objects selected from the original tree are located in disparate places across different branches of the original tree.

As clearly set forth throughout Kiernan, "the user can separate a portion of a tree control at a node and create a new tree control for viewing and editing. Changes to a newly created tree control propagate through to the related tree controls." Thus, unlike the present invention, in Kiernan, a node or particular location within a tree is identified and selected. Thereafter, the node and the nodes in the tree hierarchically below that node are created in a new window. The mere separation of a node from a tree into a new window for editing is clearly different and distinguishable from a fully customizable tree where objects are selected from disparate places across different branches of a tree.

Kiernan fails to even remotely suggest such a fully customizable tree. Similarly, Eick fails to teach, disclose, or suggest such features. Thus, Applicants submit that independent claims 1, 22, and

43 are allowable over Kiernan and Eick. Further, dependent claims 2-21, 23-42, and 44-63 are submitted to be allowable over Kiernan and Eick in the same manner, because they are dependent on independent claims 1, 22, and 43, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-21, 23-42, and 44-63 recite additional novel elements not shown by Kiernan or Eick.

### III. Prior Art Rejections under 35 U.S.C. §103

In paragraphs (3)-(4) of the Office Action, claims 2-5, 23-25, and 44-45 were rejected under 35 U.S.C. §103(a) as being unpatentable over Kiernan as applied to claims above, in view of Eick et al., U.S. Patent No. 5,912,664 (Eick).

Claim 2 was rejected as follows:

As per claim 2, Kiernan does not explicitly teach creating a filter for the selected object in response to user input, wherein the filter specifies a selection criteria to select objects to be contained within the selected object on the customized tree; and applying the filter to create the customized tree with the selected object and the objects to be contained within the selected object. However, Eick's invention discloses the step of creating a filter for the selected object in response to user input and apply the filter to the information being displayed (col. 4-6, lines 63-20, col. 7, lines 19-24). Thus, it would have been obvious to one of ordinary skill in the art at the time the invention was made to combine the teachings of Kiernan and Eick to implement the filtering's step and apply the filter because it would allow a user to select a subset of the large group in order to arrive at a screen display with sufficiently small number of items and sufficiently legible description of each item to prove a view with an opportunity to make a reasoned selection therefrom, i.e., for the purpose of updated or deleted as part of the maintenance.

The applicant traverses the above rejections for one or more of the following reasons:

- (1) *Neither Kiernan nor Eick teach, disclose, or suggest the creation of a filter comprising filter criteria, a comparator operator, and a comparison value;*
- (2) *Neither Kiernan nor Eick teach, disclose, or suggest the creation of a customized tree based on a filter;*
- (3) *Kiernan and Eick cannot be combined in an operative manner; and*
- (4) *The technical area of Eick is non-analogous to the present invention.*

The cited references do not teach nor suggest these various elements of Applicants' independent claims. Applicants have added new claims 64-105. The new independent claims (i.e., claims 64, 78, and 92) incorporated the features from original dependent claims 2, 23, and 44 and

further specify elements of the filter. Each of the filter elements are user-specified and created in response to user input. Namely, the filter contains a filter criteria (e.g., "Name" 709 of FIG. 7), a comparator operator (e.g., "Equal to" 711 of FIG. 7), and a comparison value (e.g., "Jones" 721 of FIG. 7). Accordingly, the filter and resulting customized tree are highly user-customizable. Neither Kiernan nor Eick even remotely suggest the use of such a filter or level of customization.

The Office Action admits that Kiernan fails to teach a filter (see paragraph 4 of the Office Action). However, Eick is cited for this teaching. However, as clearly noted throughout Eick, Eick is used to present "a viewer with an overall representation of the present number of entertainment programs, available for selection given one week of program schedule...". More particularly, Eick is specifically directed towards television programming schedules since they are available in "almost every home" (see col. 1, lines 21-64). In fact, the use of the technology is not intended to be used on a computer system but only on televisions (see col. 1, lines 21-64). The technology of Eick is implemented using a television 10 and a television set top box (STB) 12 (see col. 4, lines 10-12). Further, the filtering is specifically utilized for television programming (see col. 4, lines 63-66, FIG. 4, col. 6, line 22-col. 7, line 24).

In fact, there is no reference in Eick, even remotely, that indicates the use of a filter in a hierarchical tree type of environment with objects from a data storage device. Further, there is not one figure in Eick that even looks like a tree or customized tree as set forth in the claims.

Thus, since Eick is specifically directed to a particular field, fails to refer to any type of hierarchical tree structure as claimed, and teaches away from an implementation on a computer, Eick is from a non-analogous technical field. Accordingly, regardless of the description set forth in Eick, it is not related to the technical field of the invention and cannot be utilized to reject the present invention.

Further, there is no suggestion to combine Eick with Kiernan. Since Eick teaches away from the use in a computer system, Eick also teaches away from combining with Kiernan. In fact, because of this, there is no possible way to combine Eick with Kiernan. The only potential way to combine the references is if a programming schedule were stored on the computer, then Eick could be used in combination with special hardware and a remote control (and not a mouse since Eick specifically teaches the use of a remote control and away from the use of a mouse) to display a subset of the programming schedule on a television monitor. However, such functionality would

require significant additional hardware devices and the capability for interaction. Such functionality is not a filter for objects stored on a data storage device of a computer and is not a "customized tree" as claimed.

Moreover, the various elements of Applicants' claimed invention together provide operational advantages over Kiernan and Eick. In addition, Applicants' invention solves problems not recognized by Kiernan and Eick.

Thus, Applicants submit that independent claims 1, 22, 43, 64, 78, and 92 are allowable over Kiernan and Eick. Further, dependent claims 2-21, 23-42, 44-63, 65-77, 79-91, and 93-105 are submitted to be allowable over Kiernan and Eick in the same manner, because they are dependent on independent claims 1, 22, 43, 64, 78, and 92 respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-21, 23-42, 44-63, 65-77, 79-91, and 93-105 recite additional novel elements not shown by Kiernan and Eick.

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## APPENDIX A: SPECIFICATION IN MARKED-UP FORM

### IN THE SPECIFICATION

Please amend the paragraph on page 11, lines 1-11 as follows:

The folder label 705 can be used to distinguish between multiple folders enclosed in another folder. The folder label 705 may also provide an indication of the filter which is applied to the object. The Add Folder to Tree window 701 also enables a user to provide table filter information 707. The Illustrated fields 709, 711, and 713 illustrate example criteria for a filter. A criteria is entered in field 709, then field 711 is used to specify how the criteria is to be compared with the comparison values in field 713. In the next line, the Schema [715] 717 is checked via the technique of comparison chosen [717] 719, for equality, to the comparison value Jones in field [719] 721 which is set equal to JONES. The comparison criteria may be ">", "<>", "<" or any other of those well known in the art. In addition, compound filters may be created through Boolean logic comparisons, such as 715.

Please amend the paragraphs on page 12, lines 1-21 as follows:

The folders of the tree in the subwindow 817 on the left are considered containers. When the All JONES tables folder is selected (e.g., by clicking on it), the subwindow [819] 821 displays the tables 815 contained in that folder. For example, the All JONES Tables folder contains multiple tables, including, for example, a STAFF table. Fields 811, and 813 are labels for the content of the folder 805. Horizontal scroll bar 819 is included so that all of the contents of the elements contained in folder 805 may be displayed even if the elements occupy a larger area than can be displayed in window 821.

FIG. 9 illustrates another "Add Folder to Tree" window 901, generated by the customized tree creator 118, that is displayed in response to a selection of the "Add folder to tree" action. In this example a user has decided to add a folder object to the customized tree. As shown in field 903 the object type to be added is a database which will be labeled EMPLOYEE, as shown in field 905, to the customized tree. The user highlights the DSN1 folder 803 and activates the pop-up. The user selects the "Add folder to tree" action from the pop-up. When the "Add folder to tree" action is activated the "Add Folder to Tree" window 901 is displayed by the customized tree creator 118. The user indicates that the object type is a database, as shown in field 903. In this Add Folder to Tree window, an object of type Databases is to be added, with label "EMPLOYEE" as entered in field 905. The filter criteria of Name, which is entered in field 907, is to be compared for equality, as specified in field [907] 909, to EMPLOYEE as specified in field 913. When a user clicks "OK" 915 in the Add Folder to Tree window 901, the customized tree creator adds the EMPLOYEE database to the customized tree.

IV. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

Terry Michael Bleizeffer et al.

By their attorneys,

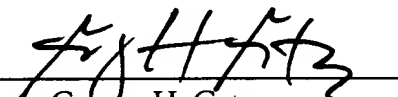
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Please amend the paragraph on page 13, lines 1-7 as follows:

FIG. 12 illustrates another "Add Folder to Tree" window 1201, generated by the customized tree creator 118, that is displayed in response to selection of the "Add folder to tree" action 1105. In this Add Folder to Tree window, an object of type "Tables" is entered in field 1203. The folder label of "JONES tables in EMPLOYEE" is created by entering "JONES tables in EMPLOYEE" in field 1207. The filter [is] Schema 1209 is chosen to be "Equal to" 1211 JONES, as entered in field [113] 1213. The user then clicks the "OK" button 1215 to accept the information as entered in window 1201.

Please amend the paragraphs on page 13, lines 17-30 as follows:

FIG. 14 illustrates launching an open command from a parent application. To invoke an existing customized tree, a user selects "Open" 1405 from the window 1403 pull down menu. A list of existing trees follow in a cascade 1407, and the user can select one from the cascade list. In the present example Bob's tree[,] 1409 has been selected as indicated by the highlight. In this example, the customized tree may also be invoked from a customized tree window, for example customized tree windows as shown in FIGS. 5, 6, 8, 10, 11, 13, by choosing the "Open" action and then selecting one of the available objects to open. The customized tree is illustrated as being opened from the "Control Center" window only as a matter of convenience, and a customized tree may be opened from a "Customized Tree" or "Control Center" window with equivalent results.

FIG. 15 illustrates the results of opening a customized tree. In FIG. 15, "Bob's Tree" is displayed in the title line 1503 of the opened window 1501 in response to the "Open" and selection of Bob's Tree in FIG. 13. As the result of opening Bob's Tree, Bob's Tree is also displayed 1505 in the left subwindow 1507.

Please amend the paragraph on page 14, lines 11-22 as follows:

FIG. 17 illustrates a Change Folder window 1701, generated by the customized tree creator 118, that is displayed in response to a "Change" action. The Change Folder window 1701 is the same as the Add Folder to Tree window 1201, except that the window reflects the selections previously made. In the present example the object type field is [table] Tables 1703, and the Folder label for object field 1705 is "[ALL] All JONES Tables". The filtering criteria 1707, 1709, 1711, 1713, 1715, and 1719 may be changed by the user if a different criteria is desired. The user makes changes desired and those changes take effect when the user clicks on the "OK" button 1721. The changes would have to be saved, for example, with the "Save" action [1311] 1411 and the contents of the object which had been selected 1607, may change as appropriate. The changed contents will then be reflected in the contents of the folder as displayed in the right subwindow when the object is selected, e.g. subwindow 1609



## APPENDIX B: CLAIMS IN MARKED-UP FORM

### IN THE CLAIMS

Please amend claims 1, 22, 24-27, 34-36, 39, 42-43, 45-47, and 49-54 as follows:

1. (AMENDED) A method of creating a customized tree in a computer from a original tree containing objects from a data storage device connected to the computer, the method comprising [the steps of]:

selecting one or more objects on the original tree to be contained in the customized tree in response to user input, wherein the one or more objects are located in disparate places across different branches of the original tree; and

linking the selected objects in a user-specified manner.

22. (AMENDED) An apparatus for creating a customized tree in a computer, the apparatus comprising:

a computer having a data storage device connected thereto, wherein the data storage device stores objects contained in a original tree; and

one or more computer programs for selecting an object on the original tree to be contained in the customized tree in response to user input, wherein the one or more objects are located in disparate places across different branches of the original tree, and linking the selected objects in a user-specified manner.

24. (AMENDED) The apparatus of claim [22] 23, wherein the means for applying the filter further comprises the means for selecting objects from multiple parent objects.

25. (AMENDED) The apparatus of claim [23] 24, wherein the multiple parent objects are contained on multiple platforms.

26. (AMENDED) The apparatus of claim [22] 23, wherein if the objects to be selected by the filter change, the customized tree is automatically updated to reflect the changed objects.

27. (AMENDED) The apparatus of claim 22, further comprising [the] means for modifying the customized tree.

34. (AMENDED) The apparatus of claim 22, further comprising [the] means for using the customized tree to simultaneously perform an action on multiple objects contained in the customized tree.

35. (AMENDED) The apparatus of claim 22, further comprising [the] means for restricting access to the customized tree.

36. (AMENDED) The apparatus of claim 22, further comprising [the] means for enabling customization of labels for objects in the customized tree.

39. (AMENDED) The apparatus of claim 22, further comprising [the] means for providing graphical user interfaces for creating the customized tree and wherein the user input is received from one or more graphical user interfaces.

42. (AMENDED) The apparatus of claim 22, further comprising [the] means for creating multiple customized trees.

43. (AMENDED) An article of manufacture comprising a computer program carrier readable by a computer and embodying one or more instructions executable by the computer to perform method steps for creating a customized tree from a original tree containing objects from a data storage device connected to the computer, the method comprising the steps of:

selecting one or more objects on the original tree to be contained in the customized tree in response to user input, wherein the one or more objects are located in disparate places across different branches of the original tree; and;

linking the selected objects in a user-specified manner.

45. (AMENDED) The article of manufacture of claim [42] 44, wherein the step of applying the filter further comprises the step of selecting objects from multiple parent objects.

46. (AMENDED) The article of manufacture of claim [43] 45, wherein the multiple parent objects are contained on multiple platforms.

47. (AMENDED) The article of manufacture of claim [42] 44, wherein if the objects to be selected by the filter change, the customized tree is automatically updated to reflect the changed objects.

49. (AMENDED) The article of manufacture of claim [46] 48, wherein the step of modifying further comprises the step of adding an object to the customized tree.

50. (AMENDED) The article of manufacture of claim [46] 48, wherein the step of modifying further comprises the step of removing an object of the customized tree.

51. (AMENDED) The article of manufacture of claim [46] 48, wherein the step of modifying further comprises the step of copying an object into the customized tree.

52. (AMENDED) The article of manufacture of claim [46] 48, wherein the step of modifying further comprises the step of copying an object from a first position in the customized tree to a second position in the customized tree.

53. (AMENDED) The article of manufacture of claim [46] 48, wherein the step of modifying further comprises the step of removing the customized tree.

54. (AMENDED) The article of manufacture of claim [46] 48, wherein the step of modifying further comprises the step of changing an object.

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FIG. 4

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